

CORRIE J. KLEKOWSKI (SBN 251338)
corrie.klekowski@quarles.com

ASHLEY D. KEARNEY (SBN 337183)
ashley.kearney@quarles.com

QUARLES & BRADY LLP
101 West Broadway, Ninth Floor
San Diego, California 92101-8285
Telephone: 619-237-5200
Facsimile: 619-615-0700

Attorneys for Defendant Gillig, LLC

ERIC E. LANCASTER (SBN 244449)
eric.lancaster@paulhastings.com

PAUL HASTINGS LLP
1117 South California Avenue
Palo Alto, CA 94304

KRISTYN HANSEN (pro hac vice)
kristyn.hansen@allenoverly.com

ALLEN OVERY SHEARMAN STERLING US LLP
599 Lexington Avenue
New York, NY 10022

MICHELLE BONE (pro hac vice)
michelle.bone@allenoverly.com

ALLEN OVERY SHEARMAN STERLING US LLP
1101 New York Avenue NW
Washington, DC 20005

Attorneys for Plaintiff Patrick E. Tryon

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

Patrick E Tryon,

Plaintiff,

v.

Gillig LLC,

Defendant.

Case No. 21-cv-07817-TSH

**JOINT STIPULATION TO CONTINUE
CASE MANAGEMENT DEADLINES**

Judge: Thomas S. Hixson
Crtrm.: G
Trial Date: June 30, 2025

1 Defendant Gillig, LLC and Plaintiff Patrick E. Tryon, acting through their respective
2 counsel of record, hereby stipulate as follows:

3 WHEREAS, on May 3, 2024, the parties participated in a settlement conference with
4 Magistrate Judge Kandice Westmore, but this matter has not yet settled;

5 WHEREAS, the parties have continued negotiations and on July 2, 2024 and on
6 September 10, 2024, filed stipulations to extend the case management deadlines to allow more
7 time for productive settlement negotiations;

8 WHEREAS, on September 11, 2024 [Dkt 76], this Court ordered that the deadline to
9 disclose expert witnesses was extended to October 25, 2024, the deadline to disclose rebuttal
10 expert witnesses was extended to November 15, 2024, the deadline to complete expert discovery
11 was extended to December 13, 2024, the deadline to file dispositive motions was extended to
12 January 9, 2025, hearings on dispositive motions shall be held on February 13, 2025, and that the
13 jury trial be moved to June 30, 2025;

14 WHEREAS, the parties' have reached a settlement in principle, are negotiating final details
15 of an agreement, and would seek to defer expert discovery and dispositive motion work to focus
16 on finalizing the terms of settlement;

17 WHEREAS, the parties agree to extend the deadline to designate expert witnesses to
18 December 23, 2024;

19 WHEREAS, the parties agree to extend the deadline to designate rebuttal expert witnesses
20 to January 23, 2025;

21 WHEREAS, the parties agree to extend the deadline to complete expert discovery to
22 February 28, 2025;

23 WHEREAS, the parties agree to extend the deadline to file dispositive motions to February
24 28, 2025;

25 WHEREAS, the parties agree that the hearing on dispositive motions shall be determined
26 by this Court based on the proposed new deadline and consistent with its motion calendar;

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1 IT IS SO STIPULATED.

2 Dated: October 25, 2024

QUARLES & BRADY LLP

3
4 By: /s/ Ashley D. Kearney

CORRIE J. KLEKOWSKI

5 ASHLEY D. KEARNEY

6 Attorneys for Defendant Gillig, LLC

7 Dated: October 25, 2024

ALLEN OVERY SHEARMAN STERLING US LLP

8
9 By: /s/ Kristyn Hansen

MICHELLE BONE

10 KRISTYN HANSEN

11 Attorneys for Plaintiff Patrick E. Tryon

12 **ATTESTATION**

13 I, Ashley D. Kearney, am the ECF user whose user ID and password authorized the filing
14 of this document. Under Civil L.R. 5-1(i)(3), I attest that all signatories to this document have
15 concurred in this filing.
16

17 By: /s/ Ashley D. Kearney

18 ASHLEY D. KEARNEY
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